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*Kathryn Ross*

Santa Clara County United Democratic Campaign  
FEC ID # C00231076  
2901 Moorpark Ave, Suite 110  
San Jose CA 95128

July 12, 2018

Via Email to cela@fec.gov

Federal Election Commission  
Washington DC 20463

RE: MUR 7384

Dear FEC Enforcement Staff:

Thank you for extending the deadline to respond to your May 23, 2018 letter to Eitan Fenson.

The Democratic Volunteer Center (DVC) is a volunteer-run office in Palo Alto, CA that is funded by and through the Santa Clara County United Democratic Campaign (FEC ID # C00231076), which is the political party committee of the Santa Clara County Democratic Party, of which I am the Chair.

Our volunteers running the DVC scheduled and conducted a number of postcard writing events for the Janz campaign (CA-22) during the months prior to the California primary election in June.

The postcards were handwritten by volunteers and were addressed by hand to addresses provided by the Janz campaign. The volunteers writing the postcards were provided model language for the message but were free to personalize the message. Postage and blank postcards were provided and paid for with funds donated to support the DVC's efforts. The postcard activity was conducted purely by volunteers for the benefit of the party's nominee. The mailings were done using stamps placed on postcards by volunteers and not conducted using a commercial mail vendor or commercial lists.

The estimated number of postcards sent on relevant dates, and the associated costs, are indicated in the following table.

Date	Time	Cards Written	Stamps	Postcard Cost	Total Cost
3/27/18	6 to 9 pm	650	\$228.00	\$45.50	\$273.50
04/04/18	10 to 12 am	250	\$87.50	\$17.50	\$105.00
04/10/18	7 to 9 pm	300	\$105.00	\$21.00	\$126.00
04/18/18	10 to 12 am	680	\$240.00	\$47.60	\$287.60
04/24/18	7 to 9 pm	800	\$280.00	\$56.00	\$336.00
04/30/18	1 to 3 pm	650	\$228.00	\$45.50	\$273.50
05/08/18	7 to 9 pm	650	\$228.00	\$45.50	\$273.50
05/14/18	1 to 3 pm	700	\$245.00	\$49.00	\$294.00
05/22/18	7 to 9 pm	600	\$210.00	\$42.00	\$252.00
05/30/18	10 to 12 pm	910	\$315.00	\$63.70	\$378.70
		6190	\$2,166.50	\$433.30	\$2,599.80

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The postage expenses are believed to have been reported as campaign expenses of the Santa Clara County United Democratic Campaign (FEC ID # C00231076), but based on the information available to me as of today I do not believe they were reported as a donation to the Janz campaign. I am in the process of obtaining information as to whether the postcard writing activities should have been reported as in kind donations to the Janz campaign, and our committee will update its FEC filings from the relevant period as needed to ensure the activities have been reported properly. Also, I will verify whether the appropriate source of funds was used to pay the expenses, and if needed we will re-allocate between state and federal funds to ensure the correct funds were used.

Our volunteers involved in this activity did not realize that postcards handwritten by volunteers may trigger disclosure obligations beyond reporting the associated costs as expenses of the DVC. I don't feel any formal action by the FEC in this matter is warranted, at least with respect to the DVC's activities, as they were limited in scope and time, and by this letter I am committing to updating our filings from the applicable period as/if needed to ensure complete reporting and correct funding of this activity and associated expenses.

Please feel free to call me at (408) 831-1336 or by email to [chair@sccdp.org](mailto:chair@sccdp.org) if you have any questions about the above information or our proposed resolution of this matter as it relates to the DVC.

Regards,



Bill James

Chair, Santa Clara County Democratic Party